

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JESSE BROWN

CIVIL ACTION

PLAINTIFF,

NO. _____

LAUREL HARRY, Commissioner

Complaint

OVERALL CORRECTIONAL FACILITIES

OF PENNSYLVANIA; WENEROWICZ,

SECRETARY OVERALL CORRECTIONAL

FACILITY OF PENNSYLVANIA; GOURLEY

SUPERINTENDENT; JENNIFER

MCCLELLAND, DECS; SPIELES UNIT

MANAGER/CAPTAIN OF THE IMU AT

CAMP HILL; KALSKY, PSS; ARE BEING

SUED IN THEIR INDIVIDUAL AND

OFFICIAL CAPACITIES;

FILED
SCRANTON

MAR 31 2025

PER

CP

DEPUTY CLERK

DEFENDANTS

I. JURISDICTION & VENUE

1) PLAINTIFF JESSE BROWN *HN1283 WRITE THIS SWORN

COMPLAINT UNDER THE DECLARED PENALTY OF PERJURY. THIS

IS A CIVIL ACTION AUTHORIZED BY 42 U.S.C. SECTION 1983 TO

REDRESS THE DEPREVIATION, UNDER COLOR OF STATE LAW,

OF RIGHTS SECURED BY THE CONSTITUTION OF THE

UNITED STATES, THE COURT HAS JURISDICTION UNDER 28 U.S.C.

SECTION 1331 AND 1343 (2)(3). PLAINTIFF BROWN SEEKS

DECLARATORY RELIEF PURSUANT TO 28 U.S.C.

SECTION 2201 AND 2202. PLAINTIFF BROWN'S CLAIMS FOR INJUNCTIVE RELIEF ARE AUTHORIZED BY 28 U.S.C. SECTIONS 2283 & 2284 AND RULE 65 OF THE FEDERAL RULES OF CIVIL PROCEDURE.

2) THE MIDDLE DISTRICT OF PENNSYLVANIA IS AN APPROPRIATE VENUE UNDER 28 U.S.C. SECTION 1391 (b)(2) BECAUSE IT IS WHERE THE EVENTS GIVING RISE TO THIS CLAIM OCCURRED.

II. PLAINTIFF

3) PLAINTIFF JESSE BROWN *HN/283 IS AND WAS AT ALL TIMES MENTIONED HEREIN A PRISONER OF THE STATE OF PENNSYLVANIA IN THE CUSTODY OF THE PENNSYLVANIA DEPARTMENT OF CORRECTIONS CAMP HILL. BROWN IS CURRENTLY CONFINED IN PENNSYLVANIA STATE PRISON IN CAMP HILL, PENNSYLVANIA, IN THE IMU AT CAMP HILL.

4) PLAINTIFF JESSE BROWN *HN/282 CAN BE SERVED AT ADDRESS: SCI-CAMP HILL; P.O. BOX 8837; CAMP HILL, PA. 17001 . . .

III. DEFENDANT

5) DEFENDANT MG. LAUREL HARRY, IS THE COMMISSIONER OF PENNSYLVANIA STATE PRISON'S. DEFENDANT HARRY IS LEGALLY RESPONSIBLE FOR THE OPERATION OF PENNSYLVANIA DEPARTMENT OF CORRECTIONS AND FOR THE WELFARE OF ALL THE INMATES OF PENNSYLVANIA PRISON'S AND OVERALL CORRECTIONAL OFFICIALS. AND RESIDES AT ADDRESS: 1920 TECHNOLOGY PARKWAY, MECHANICSBURG, PA. 17050. HARRY CAN BE SERVED AT THAT ADDRESS THIS COMPLAINT BY THE [REDACTED] SECRETARY-ASSISTANT.

6) DEFENDANT WENEROWICZ, IS THE SECRETARY OF PENNSYLVANIA DEPARTMENT OF CORRECTIONS. DEFENDANT WENEROWICZ IS LEGALLY RESPONSIBLE FOR THE OPERATION OF PENNSYLVANIA DEPARTMENT OF CORRECTIONS AND FOR THE WELFARE OF ALL THE INMATES OF PENNSYLVANIA DEPARTMENT OF CORRECTIONS AND OVER HIS SUBORDINATES BELOW HIS RANK OF PRISON GUARDS AND WAS ASSIGNED TO SCE-CAMP HELL. AND WENEROWICZ RESIDES AT ADDRESS: 1920 TECHNOLOGY PARKWAY, MECHANICSBURG, PA. 17050. WENEROWICZ CAN

BE SERVED AT THAT ADDRESS THIS COMPLAINT BY THE SECRETARY-ASSISTANT.

7) DEFENDANT GOURLEY IS THE SUPERINTENDENT OF SCI-CAMP HILL. GOURLEY IS LEGALLY RESPONSIBLE FOR THE OPERATION OF SCI-CAMP HILL AND FOR THE WELFARE OF ALL THE INMATES OF THAT PRISON AND OVERALL SCI-CAMP HILL GUARDS AND GOURLEY RESIDES AT ADDRESS: SCI-CAMP HILL, PO. BOX 8837, CAMP HILL, PA. 17001. GOURLEY CAN BE SERVED AT THAT ADDRESS THIS COMPLAINT BY THE SUPERINTENDANT-ASSISTANT.

8) DEFENDANT JENNIFER MCCLELLAND IS A CORRECTIONAL OFFICER OF THE PENNSYLVANIA DEPARTMENT OF CORRECTION CAMP HILL, WHO, AT ALL TIMES MENTIONED IN THIS COMPLAINT, HELD THE RANK OF PRISON GUARD DSCS, AND WAS ASSIGNED TO SCI-CAMP HILL IMU. JENNIFER MCCLELLAND IS LEGALLY RESPONSIBLE FOR THE OPERATION OF CAMP HILL IMU AND FOR THE WELFARE OF ALL THE INMATES OF THAT IMU AND OVERALL IMU PRISON OFFICIALS, AND RESIDES AT ADDRESS: SCI-CAMP HILL

P.O. BOX 8837; CAMP HILL, PA. 17001. McCLELLAND IS A CORRECTIONS OFFICIAL WHO CAN BE SERVED AT THAT CAMP HILL ADDRESS ANY AND ALL COMPLAINTS BY THE SUPERINTENDENT-ASSISTANT.

9.) DEFENDANT SPIELES, IS A CORRECTIONAL OFFICER OF THE PENNSYLVANIA DEPARTMENT OF CORRECTIONS CAMP HILL WHO, AT ALL TIMES MENTIONED IN THIS COMPLAINT, HELD THE RANK OF PRISON GUARD-CAPTAIN, AND WAS ASSIGNED TO SCI-CAMP HILL IMU SPIELES IS LEGALLY RESPONSIBLE FOR THE OPERATION OF CAMP HILL IMU WITH THE RANK OF A CAPTAIN PERFORMING AS THE UNIT MANAGER OF THE IMU OVERALL HIS SUBORDINATES RESPONSIBLE FOR THE WELFARE OF ALL THE INMATES OF THAT PRISON IMU, AND RESIDES AT ADDRESS: SCI-CAMP HILL; P.O. BOX 8837; CAMP HILL, PA. 17001. SPIELES CAN BE SERVED AT THAT SCI-CAMP HILL ADDRESS BY THE SUPERINTENDENT ASSISTANT THE COMPLAINTS

10.) DEFENDANT KALSKY. IS A PSS ASSIGNED TO THE PENNSYLVANIA DEPARTMENT OF CORRECTIONS CAMP HILL WHO, AT ALL TIMES MENTIONED IN

THIS COMPLAINT HELD THE POSITION AS A PSS FOR THE IMU AND WAS ASSIGNED TO THE IMU MENTAL HEALTH PATIENTS TO SCI-CAMP HILL AND RESIDES AT ADDRESS: SCI-CAMP HILL, P.O. BOX 8837, CAMP HILL, PA, 17001. KALSKY CAN BE SERVED AT THAT CAMP HILL ADDRESS BY THE SUPERINTENDENT ASSISTANT THE COMPLAINTS.

- 11) EACH DEFENDANT IS SUED INDIVIDUALLY AND IN THEIR OFFICIAL CAPACITY FOR \$350,000. AT ALL TIMES MENTIONED IN THIS COMPLAINT, EACH DEFENDANT ACTED UNDER THE COLOR OF STATE LAW.

IV. FACTS

- 12) AT ALL TIMES RELEVANT TO THIS CASE, PLAINTIFF JESSE BROWN HAD RECEIVED A MISCONDUCT REPORT *D853483 DATED 12-20-23 FOR AN PHYSICAL ALTERCATION WITH AN OFFICIAL AT SCI-ALBION.

- 13) I, JESSE BROWN HAD RECEIVED A MISCONDUCT REPORT *D853483 DATED 12-20-23 AND GOT SANCTION FOR ASSAULT 90 DAYS AND 30 DAYS

FOR REFUSING TO OBEY AN ORDER.

14) ON OR AROUND JANUARY 8, 2024 I, JESSE BROWN, WAS TRANSFERRED OUT ALBION, IN ROCKVIEW.

15) AT SCI-ROCKVIEW I, JESSE BROWN SERVED MY (RHU) RESTRICTIVE HOUSING UNIT DISCIPLINARY TIME

16) AT SCI-ROCKVIEW DEFENDANT MICHAEL WENEROWICZ HAD ENFORCED (RRL) RESTRICTIVE RELEASE ON ME, DATED 3-5-24 AND I, JESSE BROWN ONLY HAD TWO MISCONDUCTS SINCE 2015.

17) ON DATE 9-23-24 I, JESSE BROWN SEEN MICHAEL WENEROWICZ AGAIN TO BE TOLD CENTRAL-OFFICE TEAM THAT IS LEAD BY DEFENDANTS LAUREL HARRY AND WENEROWICZ ARE ENFORCING ME IN THE IMU.

18) ON DATE 10-2-24 DEFENDANTS WENEROWICZ LAUREL HARRY AND GOURLEY COME TOGETHER TO ENTERED, I JESSE BROWN IN SCI-CAMP HILL, (IMU) INTENSIVE MANAGEMENT UNIT.

19) THE IMU IS A 4-YEAR PROGRAM; (PHASE-6 IS 30 DAYS; PHASE-5 IS 9-MONTHS; PHASE⁴ IS 9-MONTHS; PHASE 3 IS 9-MONTHS; PHASE-2 IS 8-MONTHS AND PHASE-1 IN GENERAL POPULATION A WHOLE YEAR) IN WHICH I, JESSE BROWN CAN GET SET BACK PHASE'S IF I RECEIVE A MISCONDUCT OR IF I DON'T GO TO GROUP ONCE A WEEK I WILL BE PUT ON PHASE FREEZE etc.

20) I AM BEING ENFORCED IN LONG TERM CONFINEMENT; IN CAMP HELL IMU AGAINST MY WILL, CAUSING MENTAL PROBLEMS) OR AS A RESULT OF ME BEING IN THIS CHAOTIC IMU ENVIRONMENT I SUFFER'S FROM LACK OF SLEEP; OVER WHELMING FEAR PARANOIA; BEING ON EDGE; ANXIETY; DISTRESS; ANGER AND INTANGIBLE PSYCHOLOGICAL INJURIES etc. AS A MENTAL HEALTH PATIENT PLACE IN LONG TERM SOLITARY CONFINEMENT

21) THIS IDEA OF DEFENDANT MICHAEL WENEROWICZ TOTAL INCARCERATION IN THE IMU WITH MS. LAUREL HARRY APPROVAL PRL PLACEMENT IN THE IMU ON DATE 3-5-24 JUST ISN'T WORKING

AND ITS NOT HUMANE 4 YEARS SOLITARY CONFINEMENT.

22) ON DATE 3-5-24 DEFENDANT MICHAEL WENERONCZ HAS ADMITTED TO JESSE BROWN; HE WAS SPECIFICALLY FAMILIAR AND ACKNOWLEDGE THE EFFECTS OF SOLITARY CONFINEMENT WHEN PLACING INMATES LIKE JESSE BROWN IN LONG TERM SOLITARY CONFINEMENT WITH MENTAL ILLNESSES BUT WHEN JESSE BROWN LOOK AT IT DEFENDANT WENERONCZ STILL GOT THE APPROVAL OF LAUREL HARRY TO PLACE JESSE BROWN IN LONG TERM SOLITARY CONFINEMENT ON DATE 9-23-24

23) IT WAS CONFIRM FOR DEATHROW PRISONERS NOT TO BE PLACE IN LONG TERM SOLITARY CONFINEMENT BUT WHEN JESSE BROWN LOOK AT IT DEFENDANTS WENEROWECZ, HARRY AND GOURLEY PLACED HIM IN LONG TERM SOLITARY CONFINEMENT (IMU) THAT IS USED FOR ADMINISTRATIVE SEGREGATION (KNOWN AS RESTRICTIVE HOUSING IN PENNSYLVANIA).

24) I, JESSE BROWN HAD COMPLETE MY DISCIPLINARY SANCTION-TIME FOR THE INITIAL MISCONDUCT REPORT #D853483 (90 DAYS FOR ASSAULT AND 30 DAYS FOR REFUSING TO OBEY AN ORDER) BUT DEFENDANTS LAUREL HARRY; WENEROWICZ; GOURLEY; JENNIFER MCCLELLAND; SPIETES AND KALSKY STILL ENFORCE MORE CRUEL AND UNUSUAL PUNISHMENT ON JESSE BROWN BY DEFENDANTS CONSIDERING JESSE BROWN A MENTAL HEALTH PATIENT IN LONG TERM SOLITARY CONFINEMENT.

25) DEFENDANTS IDEA OF TOTAL INCARCERATION IS TO CRIMINALLY CHARGE JESSE BROWN AND GIVE JESSE BROWN A DISCIPLINARY SENTENCE FOR 90 DAYS FOR ASSAULT AND 30 DAYS FOR REFUSING TO OBEY AN ORDER; SEE (MISCONDUCT REPORT #D853483) WAS NOT ENOUGH PUNISHMENT, FOR DEFENDANTS TO LITERALLY ENFORCE JESSE BROWN IN LONG-TERM SOLITARY CONFINEMENT (IMU)

V. LEGAL CLAIMS

26) I, JESSE BROWN HAS BEEN PLACED IN LONG-TERM SOLITARY CONFINEMENT SINCE DATE

10

12-20-23 AND STILL FORCE IN LONG TERM SOLITARY CONFINEMENT AFTER SERVING MY DISCIPLINARY TIME AND BEING CRIMINALLY CHARGED WHICH DEFENDANTS CONSIDER IS NOT ENOUGH PUNISHMENT WHEN PLACING JESSE BROWN IN LONG-TERM SOLITARY CONFINEMENT (IMU) UNDER THE BELOW PREVIOUS CONDICTIONS DEFENDANTS HARRY; WENEROWITZ; GOURLEY; MCCLELLAND; SPELES; KALSKY; ACKNOWLEDGE THE EFFECT IT CAUSES JESSE BROWN A MENTAL HEALTH PATIENT IMPOSE AN ATYPICAL AND SIGNIFICANT HARSHNESS IN RELATION TO THE ORDINARY INCIDENT OF PRISON LIFE INCLUDING BASIC HUMAN NEEDS FROM THE LENGTH OF CONFINEMENT, THE AMOUNT OF TIME JESSE BROWN IS ENFORCED TO SPEND IN HIS CELL EACH DAY, SANITATION, LIGHTING, BEDDING, NOISE, VENTILATION, O.C. SPRAY, EDUCATION AND REHABILITATION PROGRAMS, OPPORTUNITIES FOR ACTIVITIES OUTSIDE CELLS, AND THE REPAIR AND FUNCTIONING OF BASIC PHYSICAL FACILITIES SUCH AS PLUMBING, WATER, VENTILATION AND SHOW AND/OR

27) I, JESSE BROWN SUFFERS THE CONDITIONS OF LONG TERM SOLITARY CONFINEMENT UNDER THE AUTHORITY OF DEFENDANTS HARRY; WENEROWICZ; GOURLEY; SPIELER, MCCLELLAND AND KALSKY CRUEL AND UNUSUAL PUNISHMENT IN VIOLATION TO JESSE BROWNS 1st, 8th, AND 14th AMENDMENT RIGHTS OF THE CONSTITUTIONAL LAWS OF PRISONERS RIGHTS AS FOLLOW

28) DEFENDANTS IS AWARE BROWN WAS UNDER SCF-CAMP HELL CHAOTIC ENVIRONMENT (IMU) LIVING CONDITIONS SINCE DATE 10-2-24

29) DEFENDANTS IS AWARE THEY REFUSED BROWN ARGUMENT TO EXAMINE WHETHER THE CONDITIONS OF CONFINEMENT AMOUNT TO UNINHABITABLE, DANGEROUS, HAZARDOUS OR TORTUOUS CONDITIONS IN THE CONSTRUCTION, DURABILITY AND/OR VIABILITY OF PHYSICAL FORM OF THE CAMP HELL IMU OR IN THE TREATMENT BROWN RECEIVE IN THE PARTICULAR FACILITY IMU, SINCE DATE 10-2-24

30) BROWN HAVE BEEN ASKING DEFENDANTS SINCE DATE 10-2-24 TO CONSIDER THE DURATION WHICH

CONCERNS JUST HOW LONG BROWN SPENT AND HAVE TO SPEND UNDER SCF-CAMP HELL IMU (SOLITARY CONFINEMENT) TEMPESTUOUS CONDITIONS AS AN MENTAL HEALTH PATIENT.

31) DEFENDANT'S IS AWARE OF SEVERAL ISSUES BROWN COMPLAINED THAT HAD EXIST SINCE DAY ONE OF BROWN ARRIVAL AT SCF-CAMP HELL IMU ON DATE 10-2-24; THAT MIGHT SPARK THIS COURT'S ATTENTION, INCLUDES: (1) NO CALL BUTTONS (EMERGENCY PAGING SYSTEMS IN IMU CELLS); (2) NO FIRE DREILS, NOR WRITTEN FIRE SAFETY INSTRUCTIONS; (3) NO COVID PRECAUTIONS (NO PROPER SANITATION IS EMPLOYED CONCERNING: HANDCUFFS; WAIST RESTRAINTS; SHACKLES; SHOWERS; KIOSKS; PHONES; SECURED [CELL DOOR] APERTURES; WINDOWS; TOP & BOTTOM TIER; GROUP AREAS; LAW LIBRARY AREAS; MEAL CHARTS; HYGIENE SUPPLIES; RAZORS CHART, etc. (4) A YEAR BROWN IS GOING TO BE ONLY ALLOWED 3 SHOWERS A WEEK; (5) EACH IMU CELL HAVE DUSTY VENTILATIONS; (6) BROWN HAD TO DRINK THE IMU LUKE WARM, ODOR TASTING WATER THAT SMELL BAD; (7) BROWN LOSS A LOT OF

SLEEP WITH THE NIGHT LIGHTS ON THAT BURNS 24/7 IN THE IMU CELLS; (8) BROWN DAYS IN THE IMU IS BASED ON, HIGHLY INVASIVE, NUDE SEARCHES, EVEN WHEN RESTRAINTS REMAIN ON FOR THE ENTIRE TIME BROWN IS OUT OF THE CELL; (9) BROWN IS FORCED TO BE SHACKLED AND HANDCUFFED TO THE WAIST - IN FRONT OF VISITORS - DURING VIDEO VISITS THAT ARE SECURED IN A SMALL BOOTH-SIZED CAGE, WHICH IS SECURED IN A ROOM HALF THE SIZE OF A CELL, FOR AN ENTIRE HOUR; (10) BROWN IS BEING DEPRIVED OF FOOD IF BROWNS BED IS NOT MADE AND/ OR SHOES ARE NOT ON BROWN FEET AT MEAL TIMES WHEN GUARDS COME TO BROWN CELL HAS HANDS ALSO HAVE TO BE RAISE IN THE AIR WITH BROWN STANDING IN THE BACK OF HIS CELL WITH LIGHT ON AND NOTHING ON WALLS OR COVERING WINDOWS; (11) NO WEEKLY LAUNDRY SERVICES (FOR BROWNS THERMALS, LONG-JOHN'S, T-SHIRTS, BOXERS-BRIEFS, SOCKS AND BLANKETS); (12) NO TRADE OUT ON PLASTIC SPOONS WEEKLY FOR BROWN; (13) BROWN HAVE NO TRASH BAGS, NOR SCHEDULE FOR TRASH COLLECTION SERVICES AS IMU GUARDS JUST THROW BROWN TRASH ON THE TIER EVERY TIME BROWN COME OUT HIS CELL, AND (14) WEEKS

BROWN SEEN THE TIER DIRTY WITH NO DAILY BLOCK WORKER TO CLEAN TIERS (EACH MONTH); SINCE DATE 10-2-24; (15) BROWN IS AWARE, IMU FOOD TRAYS TOP LID'S DURING SERVINGS OF MEAL'S ARE DIRTY; (16) GROUPS AND YARDS ARE CANCEL IN THE IMU DUE TO NO LIETENANT OR OTHER BLOCK'S INMATES ISSUES OR MECHANIC CANCELLATION OF DAILY ACTIVITIES ON A WEEKLY BASIS; (17) BROWN HAVEN'T BEEN PROVIDED, NO MEANS FOR ADEQUATE PHYSICAL EXERCISE IN THE IMU; AND (18) CAMP HELL IMU, HAVE NO MEANS FOR ADEQUATE PHYSICAL SOCIAL INTERACTIONS WITH OTHER INMATES; OR ~~THE~~ BROWN ~~DE~~ DEPRIVATIONS ASSOCIATED, EXERCISE ABNORMAL VOCATIONAL AND EDUCATIONAL ACTIVITY, IN THE IMU IS ATYPICAL AND SIGNIFICANT HARSHED ON BROWN A MENTAL HEALTH PATIENT. SUBJECTED TO THESE ROUTINE CONDITIONS SINCE DATE 10-2-24 WITH 4-YEARS LONG-STRETCH TIME UP/HOLDING TO DO IN SOLITARY CONFINEMENT (KNOWN AS THE RESTRICTIVE HOUSING UNIT) FOR AN VIOLATION OF THE EIGHTH AND FOURTEENTH AMENDMENT. WHERE TO BROWN HAS BEEN STRIPPED AC-STATUS PRIVILEGES-(LONG TERM FOOD ITEMS & ALL BROWNS PROPERTY) IN THE IMU. BROWN IS ALSO FORCE TO LIVE IN CELLS THAT BECOME INFESTED WITH MICE/RATS ETC.

32) AS BROWN SERVED HIS DISCIPLINARY SANCTIONS FOR MISCONDUCT *D853483 AND ISN'T A DANGER TO HIMSELF OR OTHERS; SHOW DEFENDANT'S RETALIATORY ACTS FOR BROWN PRIOR MISCONDUCT *D853483 TO KEEP BROWN CONFINED ESSENTIALLY OF DC-ACTIONS IN THE IMU. LONG-TERM SOLITARY CONFINEMENT. VIOLATED THE FIRST AMENDMENT RIGHTS TO BROWN CONSTITUTIONS.

33) DEFENDANT'S ABSENCE OF A FINDING TO KEEP BROWN IN SOLITARY CONFINEMENT ~~WITH~~ WITH NO JUSTIFICATION MET AS BROWN COMPLETED HIS MISCONDUCT *D853483 DISCIPLINARY SANCTION BEFORE HE WAS ILLEGALLY / UNLAWFULLY ENFORCED IN SCF CAMP HELL IMU IN THE RESTRICTIVE HOUSING DISCIPLINARY CUSTODY INMATES AREA.

VI. EXHAUSTION

34) BROWN HAS EXHAUSTED ALL AND ANY ADMINISTRATIVE REMEDIES THAT WAS ALLOWED TO EXERCISE UNDER DC-804 GRIEVANCE PROCEDURES TO SEEK REDRESS FROM THE PRISON FOR THE DEFENDANT'S VIOLATION OF BROWN

FIRST, EIGHTH AND FOURTEENTH AMENDMENT TO THE
UNITED STATES CONSTITUTION,

VII. RELIEF.

35) BROWN'S PRAYER FOR RELIEF RESPECTFULLY
ASKED OF THIS COURT TO ENTER JUDGMENT:

36) GRANTING BROWN A DECLARATION THAT THE
ACTS AND OMISSIONS DESCRIBED HEREIN
VIOLATE BROWNS RIGHTS UNDER THE CONSTITUTION
AND LAWS OF THE UNITED STATES, AND

37) A PRELIMINARY AND PERMANENT INJUNCTION
ORDERING DEFENDANTS LAUREL HARRY, AND
MICHAEL WENEROWICZ TO REMOVE BROWN FROM
THE IMU AND TRANSFER BROWN TO PHOENIX
OR CHESTER TOWARDS BROWN REGION, AND

38) GRANTING BROWN COMPENSATORY DAMAGES
IN THE AMOUNT OF \$350,000 AGAINST EACH
DEFENDANT, JOINTLY AND SEVERALLY.

39) BROWN SEEKS NOMINAL DAMAGES AND

PUNITIVE DAMAGES IN THE AMOUNT OF \$5,000 EACH DAY BROWN WAS CONFINED IN THE IMU AT SCI-CAMP HILL.

40) BROWN SEEK A JURY TRIAL ON ALL ISSUES TRIABLE BY JURY.

41) BROWN SEEK RECOVERY OF THE COSTS IN THIS SUIT, AND LAWYER FEES AND COSTS, AND ANY ADDITIONAL RELIEF THIS COURT DEEMS JUST, PROPER, AND EQUITABLE.

VIII. VERIFICATION

- I HAVE READ THE FOREGOING COMPLAINT AND HEREBY VERIFY THAT THE MATTERS ALLEGED THEREIN ARE TRUE, EXCEPT AS TO MATTERS ALLEGED ON INFORMATION AND BELIEF, AND, AS TO THOSE, I BELIEVE TO BE TRUE. I CERTIFY UNDER THE UNITED STATES DECLARED PENALTY OF PERJURY THAT THE FOREGOING IS TRUE CORRECT, AND ADEQUATE.

JESSE BROWN HNT283
SCI-CAMP HILL
P.O. BOX 8837
CAMP HILL PA 17001

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JESSE BROWN

CIVIL ACTION

PLAINTIFF

NO. _____

LAURE^V'L HARRY COMMISSIONER

Complaint

OVERALL CORRECTIONAL FACILITIES

OF PENNSYLVANIA; WENEROWICZ,

SECRETARY OVERALL CORRECTIONAL

FACILITY OF PENNSYLVANIA; GOURLEY

SUPERINTENDENT; JENNIFER

MCCLELLAND, DSCS; SPEELES UNIT

MANAGER/CAPTAIN OF THE EMU AT

CAMP HILL; KALSKY, PSS; ARE BEING

SUED IN THEIR INDIVIDUAL AND

OFFICIAL CAPACITIES;

DEFENDANTS

CERTIFICATE PROOF OF SERVICE

NOW ON DATE 3-30-25 I AM SENDING THIS

CERTIFICATE ATTACHED TO A CIVIL ACTION COMPLAINT

AND MOTION FOR APPOINTMENT OF COUNSEL IN THIS OUT-

GOING PRE-PAID FIRST CLASS MAIL DELIVERY TO THE MIDDLE

DISTRICT OF PENNSYLVANIA FOR AN ORDER GRANTED.

JESSE BROWN HN1283

HONORABLE JUDGE

NAME _____

SCI-CAMP HILL

SIGNATURE _____

P.O. Box 8837

CAMP HILL PA 17001

THE MIDDLE DISTRICT COURT OF
PENNSYLVANIA

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JESSE BROWN

CIVIL ACTION

PLAINTIFF

NO. _____

V.
LAUREL HARRY COMMISSIONER

COMPLAINANT

OVERALL CORRECTIONAL FACILITY

OF PENNSYLVANIA; WENEROWITZ

SECRETARY OVERALL CORRECTIONAL FACILITIES

OF PENNSYLVANIA; GOURLEY SUPERINTENDENT;

JENNIFER MCCLELLAND DCS; SPEELER UNIT

MANAGER / CAPTAIN OF THE TMU AT CAMP HILL;

KALSKY PSS; ARE BEING SUED IN THEIR

INDIVIDUAL AND OFFICIAL CAPACITIES

DEFENDANTS

CERTIFICATE PROOF OF SERVICE

AND NOW THIS DAY TO BE THE 25th DAY OF MARCH 2025

I AM SENDING THIS CERTIFICATE ATTACHED TO PLAINTIFF

MOTION TO PROCEED INFORMA PAUPERES IN THIS

OUTGOING PREPAID FIRST CLASS MAIL DELIVERY FOR

AN ORDER GRANTED

HONORABLE JUDGE

JESSE BROWN HN1283

NAME _____

SCF-CAMP HILL

SIGNATURE: _____

P.O. BOX 8837

IN THE U.S. MIDDLE DISTRICT

CAMP HILL PA. 17001

COURT OF PENNSYLVANIA

DATE 3-25-25

SMART Communications / PA DOC
SCI Camp Hill
Jesse Brown #HN1283
P.O. Box 33028
St. Petersburg, FL 33733

RAY-X SMSN

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